

ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

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Just after 6:30 p.m. on February 16, 2019, the Defendant, **EVER RAMIRO TORRES ENRIQUEZ** (“**TORRES**”), and his coworker (“**Co-Conspirator 1**”) robbed at gunpoint Business 1, a jewelry store located in Takoma Park, Maryland. At approximately 6:36pm, **TORRES** entered the store, pretending to be looking for jewelry for his girlfriend. Moments later, **Co-Conspirator 1** entered the store, brandished a handgun, and demanded money and jewelry. At about that same time, **TORRES** pulled a black rifle he had concealed from within his clothes and also demanded money, pointing the rifle at his victims. At one point during the robbery, **Co-Conspirator 1** forcibly removed a necklace from around one customer’s neck. In fear for their lives, the store employees gave the Defendants \$7,900 in cash and over 400 pieces of jewelry valued at approximately \$167,067.11. After collecting the jewelry and cash, **Co-Conspirator 1** and **TORRES** left the store, forcibly carjacked two male victims in a nearby vehicle, and fled the scene. The stolen vehicle was later recovered. Below is a still image of **TORRES** from the robbery surveillance:



Neither **TORRES** nor **Co-Conspirator 1** were wearing gloves during the robbery. A latent palm print lifted from one of the jewelry store’s glass counters matched a known print of **Co-Conspirator 1**’s left palm. DNA found on gloves recovered from the carjacked vehicle matched known DNA taken from **TORRES**.

In the days following the robbery, **TORRES** pawned some of the jewelry that he had stolen on at least two occasions. First, on February 17, 2019, **TORRES** pawned four pieces of gold jewelry stolen from Business 1 at Pawn Shop 1, located in Wheaton, Maryland, in exchange for \$300 cash. On February 24, 2019, **TORRES** pawned six more pieces of stolen gold jewelry at Pawn Shop 1, this time for \$330. **TORRES** used his Guatemalan Consular Identification Card during both transactions.

On June 14, 2019, **TORRES** was arrested, and, after waiving his *Miranda* rights, confessed to committing the jewelry store robbery. The confession was video recorded.

Business 1 conducted business in and affecting interstate commerce by, among other things, obtaining and selling goods that were manufactured outside of the State of Maryland and obtained from vendors outside of the State of Maryland.

SO STIPULATED:

Burden Walker

Burden H. Walker
Assistant United States Attorney

Eyer Ramiro Torres Enriquez

Eyer Ramiro Torres Enriquez
Defendant

Christopher C. Nieto

Christopher C. Nieto, Esq.
Counsel for Defendant